

**Supporting Statement  
for  
Sewage and Graywater Discharge Records for Certain  
Cruise Vessels Operating on Alaskan Waters**

**A. Justification**

1. Circumstances that make the collection of information necessary.

This information collection is needed to support Federal regulations that cover the discharges of graywater into the Alaskan navigable waterway. These rules are in response to Title XIV of Public Law 106-554 (passed on December 21, 2000), directing the Secretary to develop regulations incorporating an inspection regime into the commercial vessel examination program. This inspection regime verifies that cruise vessels transiting the applicable waters of Alaska are in full compliance with all treated and untreated sewage and graywater discharge laws and regulations. Collection of the information via the certification of participation under Quality Assurance/Quality Plan (QA/QCP), Vessel Specific Sampling Plan (VSSP), the Sewage & Graywater Discharge Record Book, and submission of a statement certifying compliance with the standards are necessary for two important reasons: (1) to determine compliance with the applicable laws and regulations, and (2) to create a historical record to prevent patterns that circumvent or nullify consistent compliance with the law and for the proper application of enforcement provisions of the applicable law and regulations.

Approximately 1,000,000 cruise vessel passengers and crew transited Southeast Alaska waters in the summer of 2001, where a resident population of approximately 60,000 exists. Based on high levels of fecal coliform and total suspended solids found in graywater and treated sewage as a result of the voluntary testing conducted during the 2000 cruise vessel season, the Coast Guard has determined that a sampling and reporting regime is necessary to allow timely detection and corrective action.

This information collection supports the following strategic goals:

Department of Homeland Security

- Prevention
- Protection

U.S. Coast Guard

- Protection of the Natural Resources

Marine Safety, Security and Stewardship Directorate (CG-5)

- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

2. By whom, how, and for what purpose the information is to be used.

The sampling protocol with a VSSP describes where samples are drawn on board cruise vessels, how those samples are transported to the lab, how the lab tests and analyzes the

samples, the quality review applied to the test results, and how the information will be reported to the Coast Guard. Documentation of sewage and graywater discharges from cruise ships operating within certain waters of Alaska in the form of a Sewage and Graywater Discharge Record Book and reports of sewage and graywater discharge test results creates a reference for Coast Guard personnel to determine compliance with Public Law 106-554 and the regulations promulgated there under.

3. Consideration of the use of improved information technology.

In consideration of efficiencies of information technology, the sampling protocol with a vessel specific sampling plan and certification statements can be manually sent or submitted in an electronic format that is readable by both the Coast Guard and Alaska Department of Environmental Conservation's information data systems. The Sewage and Graywater Discharge Record Book is typically a manual system that requires various entries and signatures, which will be maintained on board each cruise vessel and available at all times the cruise vessel is operating within the jurisdiction of the United States by the Coast Guard. The Sewage and Graywater Discharge Record Book will not be required to be submitted to the Coast Guard, however, the Coast Guard may review and make copies of entries into the record during a visit to the vessel. These records will be generated during the normal course of a shipboard engineering watch and entries made in multiple locations throughout the ships engineering spaces. Original signatures and unalterable, manual record entries are required to ensure authenticity for enforcement purposes.

We estimate that 100% of the reporting and recordkeeping requirements can be done electronically. At this time, we estimate that 25% is done electronically.

4. Efforts to identify duplication. Why similar information cannot be used.

This requirement is not covered by any other law or regulation. Therefore, this is not a duplicative reporting requirement.

5. Methods to minimize the burden to small business if involved.

These regulations are applicable to operators of cruise vessels carrying 500 or more passengers, which are typically owned by corporations that do not qualify as small entities. Therefore, the Coast Guard believes that this information collection does not have an impact on small businesses or other small entities.

6. Consequences to the Federal program if collection were done less frequently.

Less frequent collection could result in an increase in the probability of an illegal discharge not being detected. Discharges create the possibility of the contamination of fish, other marine mammals and wildlife, with an overall negative impact to public health and safety and the ecology.

7. Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with the guidelines.

This information collection is conducted in manner consistent with the guidelines in 5 CFR 1320.5(d)(2)..

8. Consultation.

A 60-day Notice will be published in the *Federal Register* to obtain public comment on this collection.

9. Explain any decision to provide any payment or gift to respondents.

There is no offer of monetary or material value for this information collection.

10. Describe any assurance of confidentiality provided to respondents.

There are no assurances of confidentiality provided to the respondents for this information collection.

11. Additional justification for any questions of a sensitive nature.

There are no questions of sensitive language.

12. Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

Table 12.1 depicts the hour and cost burdens associated with this collection.

Table 12.1

	Logbook Entries (See note 1)	Submission of Participation Cert	Submission of Compliance Cert	Submission of VSSP
# Vessels (= # of respondents)	157	157	157	157
Annual # of Responses/Vessel	150	1	1	1
TOTAL Annual Responses	23,550	157	157	157
<b>GRAND TOTAL ANNUAL RESPONSES</b>	<b>24,021</b>			
<b>TOTAL # RESPONDENTS</b>	<b>157</b>			
Engineer Burden Hours/Response	0.07	0.25	0.5	1
Clerical Burden Hours/Response	0	0.25	0.5	0.5
Annual Engineer Hour Burden	1649	39	79	157
Annual Clerical Hour Burden	0	39	79	79
Subtotal Annual Hour Burden	1649	78	158	236
TOTAL Engineer Annual Hour Burden	1924			
Engineer Hourly Wage Rate	\$84			
TOTAL Clerical Annual Hour Burden	197			
Clerical Hourly Wage Rate	\$33			
<b>GRAND TOTAL ANNUAL HOUR BURDEN</b>	<b>2121</b>			
<b>GRAND TOTAL ANNUAL COST BURDEN</b>	<b>\$168,117</b>			

Note 1: Log entries will be made during the cruise vessels' summer cruise season, typically running from May to September, and only while in the applicable waters of Alaska. The Coast Guard assumes that each vessel will make one log entry per day, on each of the 150 days in the cruising season.

Note 2: The hourly burden associated with each element of this collection consists of both licensed engineer effort and clerical effort, except in the case of the log entries, requiring no clerical time. The estimated burden for each reflects time for the engineer to review the document for accuracy, and for the clerical staff to duplicate and transmit it. Log entries are made by the licensed engineer, and require no clerical effort. The responsibilities of a licensed engineer and clerical staff are commensurate with that of a Lieutenant (O-3) and a GS-5, respectively. The wage rates are for “Out-Gov’t,” taken from the current edition of COMDTINST 7310.1L.

13. Estimate of capital and start-up costs.

There are no capital, start-up or maintenance costs associated with this information collection.

14. Estimated of annualized Federal Government costs.

The annualized cost to the Coast Guard is shown in Table 14.1.

Table 14.1

	Review of Logbook Entries	Review of Participation Cert	Review of Compliance Cert	Review of VSSP
# Vessels	157	157	157	157
Review Hour Burden/Document	0.25	0.5	0.5	2
Total Annual Review Time	39	79	79	314
<b>GRAND TOTAL ANNUAL HOUR BURDEN</b>	<b>510</b>			
Reviewer Hourly Rate	\$67			
<b>TOTAL ANNUAL COST BURDEN</b>	<b>\$34,187</b>			

Annualized costs to the Coast Guard for associated travel expenses are estimated to be \$1,000 for Coast Guard members to oversee the sampling effort. It is expected that .25 Full Time Equivalency (FTE) will be utilized in reviewing reports and conducting expanded environmental compliance exams of cruise vessels as required. During the Summer 2000 season, three such oversight trips were made at an approximate cost of \$1,000. It is anticipated that these oversight trips will continue at approximately the same frequency. Again, this is all an estimate, based on a previous year's sampling oversight efforts. As the program evolves, this could change. It is unknown at this time what those changes may be. It is not anticipated that the Coast Guard will receive additional FTE for this and therefore the review of reports and examination of cruise vessels will be at no additional cost.

15. Explain the reasons for the change in burden.

The change in burden (i.e., increase) is an ADJUSTMENT due to an increase in the vessel population. The reporting and recordkeeping requirements and the methodology for calculating burden remain unchanged.

16. For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis, and publication.

This information collection will not be published for statistical purposes.

17. Explain the reasons for seeking to not display the expiration date for OMB approval of the information collection.

The Coast Guard will display the expiration date for OMB approval of this information collection.

18. Explain each exception to the certification statement.

The Coast Guard does not request an exception to the certification of this information collection.

**B. Collection of Information Employing Statistical Methods.**

This information collection does not employ statistical methods.